

From: Don Thuente [mailto:don.thuente@efirstbank.com]

Sent: Monday, March 02, 2009 6:16 PM

To: Comments

Subject: RIN 3064-AD35 FDIC

1.) Timing of Special Assessment Announcements. In response to the request for comment, I would merely point out that if the FDIC announces a special assessment on the last calendar day of the quarter, I think it creates a liability to the financial institutions at that time, which could create a timing problem in getting those liabilities and expenses recognized before the end of day. Although your proposed rule makes it clear that it is important to the FDIC to use the latest information possible, I think it is equally important to recognize that financial institutions need a little time to properly reflect the impact of special assessments. Announcing on the last day of a quarter does not provide a realistic time frame to disseminate the information and give institutions time to act on it.

Don Thuente
FirstBank Holding Company
Lakewood, CO